Proposed management objectives for the PH Programmatic Workplan

Assignment to Eco Team: At our September 19 Eco Team work session, Val and Chris mentioned that the Portland Harbor Programmatic Workplan and resulting Eco documents lacked some essential components – specifically, a problem formulation statement and clearly stated set of management objectives to guide the investigation and risk assessment. The Eco Team discussed this and tasked EI with drafting proposed management objectives, and at our October 3-4 Eco Team work session, Val presented the objectives below for your consideration. Please review these objectives, note your comments, and come prepared to discuss them at during our October 24-25 Eco Team work session.

In addition, please consider the following justification (from Val and Chris) for adding management objectives such as these to the workplan.

> As you are probably are aware, EPA has a trust responsibility to protect the rights and interests of the tribes. Salmonids, lamprey and sturgeon are fundamental to tribes and a part of the rights and interest that must be protected by EPA acting in their trust capacity. It is important to be explicit that the protection of individuals of these species is a management objective, to be sure that *all* members of the LWG understand the importance of salmonids, lamprey, and sturgeon in EPA's risk management/protection strategy. Clarifying the management objectives also helps ensure that there is a shared vision on the government team regarding this objective and, if there is not, to discuss the issue and come to a resolution that supports our already positive relationship. This needs to be accomplished before Round 3.
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> From a purely technical perspective, providing explicit management objectives that include protection of salmonid, lamprey and sturgeon will help the government team identify "data gaps," "prioritize" studies and weigh remedial alternatives in the FS. The management objectives help clarify the basis for the governments' need for greater certainty regarding the risk to these species, for which there are no other indicator species, than that provided through modeling and "assumptions" alone. The uniqueness of the species, and the lack of studies regarding toxicity, behavior and residence time, leads to a high degree of uncertainty about risk if we simply model and make "assumptions." A management objective related to these species communicates the importance of reducing this uncertainty and offers a type of justification for further collection of site specific data regarding these species as we have highlighted in our prior Eco Team meetings.

Next steps: At our October 25 Eco Team work session, we will discuss and agree on whether the management objectives proposed below or other management objectives should be added to the PH Programmatic Workplan. If we agree that they should be added, we will forward our recommendation to the full TCT for consideration, as this is something that could affect the larger investigation and feasibility study. If the TCT agrees with our recommendation, the Eco Team will include the addition of management objectives in our direction to the LWG in mid-November.

PROPOSED MANAGEMENT OBJECTIVES

Adopt source controls, undertake cleanup actions and adopt risk management approaches to:

1. Achieve contaminant levels in fish (resident, sturgeon, lamprey and salmonids) and contaminant levels in aquatic organisms consumed by humans (e.g., clams) that are protective of people in high risk consumption categories -- tribal members and other subsistence users.
2. Achieve contaminants levels in water protective of the health of those living along the river (e.g., in tent homes), and protective of the beneficial use of the river as a source of drinking water.
3. Reduce contamination in the pore water, sediments, river water, seeps and riparian habitat to make the river and its riparian habitat healthy for:

A. all individuals of species that are listed and/or are of cultural significance (e.g., salmon, lamprey, sturgeon),
B. all individuals of species that are listed as threatened or endangered by the state or federal government, and
C. populations of other non-special status species that are found in the area, with special emphasis on species of concern and candidate species.

4. Build toward a full functioning ecosystem in the lower Willamette River that supports the robust ecological diversity that is revered by tribes and prized by non-tribal Pacific Northwesterners understanding that the Superfund program must necessarily be dovetailed with:
A. natural resource restoration taken under a CERCLA NRDA,
B. actions taken under other regulatory programs, and
C. collaborative efforts of industry, the public, and government.